

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Jennifer Hough,

Plaintiff,

-against

Onika Tanya Maraj, AKA (“Nicki Minaj”)
an individual,
Kenneth Petty, AKA (“Zoo”),
an individual

Defendants.

Civil Action No. 21-cv-4568

Declaration of Tyrone A. Blackburn

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I, Tyrone A. Blackburn, hereby declare according to 28 U.S.C. §1746 as follows:

1. I am an attorney duly admitted to practice in the State of New York. I am also co-counsel for Plaintiff Jennifer Hough (“Ms. Hough”) in the above matter. I have personal knowledge of the facts set forth in this Declaration.
2. On August 13, 2021, this case was filed on behalf of Ms. Hough. On September 2, 2021, Ms. Hough filed her first amended complaint.
3. Prior to, and after filing suit, this writer sent several emails to Onika Tanya Maraj’s (“Maraj”) prior counsel, (**Exhibit A (10/27 Blackburn Dec.)**) Peter Ross, and called her current management team. Additionally, I contacted Kenneth Petty’s (“Petty”) current defense counsels, Hagop Kuyumjian, and Michael A. Goldstein. (**Exhibit B (10/27 Blackburn Dec.)**) All the counsels ignored my emails.
4. I learned of Petty’s address through his registration on California’s sex offender’s registry. (**Exhibit C (10/27 Blackburn Dec.)**).
5. On September 15, 2021, registered process server, Robert Diaz, served a summons and

complaint on Petty at his Calabasas, California home located at 23483 Park Colombo, Calabasas, CA 91302. Process server Diaz also served a summons and complaint on Maraj through Petty. (**Exhibit D (10/27 Blackburn Dec.)**).

6. Maraj was in the Calabasas, California home listed above on September 15, 2021. This is evidenced from the Instagram live video she shot from her home that evening. (**Exhibit E (10/27 Blackburn Dec.)**).
7. The date for Maraj and Petty to answer, and or move with regards to the complaint was October 6, 2021. Maraj and Petty made the conscious decision to ignore this action.
8. On October 11, 2021, five days after their deadline to answer and or move with regards to this complaint, I filed a request for certificate of default from the clerk of the court.
9. On October 14, 2021, Counsel for Maraj, Judd Burstein made an appearance in this case. On October 25, 2021, Counsel for Petty, Steven D. Isser made an appearance in this case.

Petty Sues the State of New York:

10. On August 19, 2021, six days after Ms. Hough filed suit against Petty and Maraj, Petty filed suit against the state of New York in, 1:21-cv-04677-EK-RLM, Petty v. New York State et al. (Exhibit F (10/27 Blackburn Dec.)).
11. According to his August 19, 2021, court filing, Petty is domiciled in New York and has a residence at 123-40 Inwood Street, Jamaica, New York 11436.
12. Before commencing the instant action, I researched property owned by the Defendants and found that, in 2019, Maraj transferred real property in Long Island, New York, to Petty. Located at 967 Middle Bay Drive, Baldwin, NY 11510. (Exhibit A).
13. Thus, it was reasonable to assume that – at the very least – the parties, as husband and wife, are both domiciled in New York.

14. In a show of utter disrespect for this court, and for these proceedings, Petty has yet to file an answer and or move in this action, although he is literally a few doors down from Judge Vitaliano's courtroom suing the state of New York.

15. Petty's disrespect of the legal process is in line with his consistent residency on the wrong side of the law.

- a. In 2006, Petty pleaded guilty to a charge of manslaughter for the 2002 senseless murder of Lamont Robinson.
- b. In 2013, Petty was required to register as a level 2 sex offender because of the 1994 rape of Ms. Hough.
- c. On August 6, 2021, Petty pleaded guilty for failure registering as a sex offender in the Central District of California. As of the date of this declaration, Petty is awaiting sentencing.

Petty has no rehabilitative characteristics:

16. As if pleading guilty to several felonies wasn't enough, on or about August 12, 2021, the associate Petty and Maraj sent to Ms. Hough's house, Barry Dukes, AKA "Black" posted a threat to his Instagram live threatening to kill Ms. Hough. (**Exhibit G (10/27 Blackburn Dec.)**).

17. On September 3, 2021, I sent a letter to Judge Michael W. Fitzgerald, in the Central District of California, AUSA Kathrynne Seiden, Jeffrey Thomason, Acting Chief of the United States Probation and Pretrial Services Office ("USPPSO"), Officer Devona Gardner of the USPPSO, as well as Petty's counsels of record informing them of the death threat Petty and Maraj's associate Black aimed and directed at Ms. Hough. (**Exhibit H (10/27 Blackburn Dec.)**).

18. After notifying Judge Fitzgerald of his actions, and the actions of those acting on his behalf, one would think Petty and Maraj would cease and desist encouraging and personally engaging in threatening the life, Jennifer Hough. Unfortunately, Maraj and Petty relishes their residency on the wrong side of the law.
19. On October 23, 2021, four days prior to this declaration, and two days prior to Petty's counsel making an appearance in this case, Petty and Maraj were both in this district, in Jamaica Queens, New York. As seen on an Instagram live video currently up on Maraj's Instagram page, both Maraj and Petty were seen associating with members of the Makk Ballers set of the Bloods Gang. Petty and Maraj are both members of this gang. (**Exhibit I (10/27 Blackburn Dec.)**).
20. Petty can be visibly seen posing and throwing up gang signs with his fellow Makk Ballers Bloods gang members. (**Exhibit J (10/27 Blackburn Dec.)**).
21. On October 23, 2021, shortly after Petty and Maraj are spotted with their gangster colleagues, a member of the gang posted a death threat to Ms. Hough on Twitter, stating: "Jennifer if you see this, the Makks are coming to get you." (**Exhibit K (10/27 Blackburn Dec.)**).
22. All of the exhibits listed in this declaration are the same exhibits in the declaration signed by me on October 27, 2021 submitted in support of Ms. Hough's motion for default judgment against Petty. Due to the volume of the exhibits, and in the interest of eliminating redundancy, it is by incorporated herein.

I declare under penalty of perjury that the preceding is true and correct.

Executed on November 8, 2021.

Tyrone A. Blackburn, Esq.
Tyrone Blackburn